CALFED PEIS, p. 2-6, 1st column, 1st full paragraph:

The No Action Alternative is used as a basis for comparison of the project alternatives. The purpose of this comparison is to highlight the changes to the environment that would take place as a result of implementing the various alternatives. CALFED is also comparing the project alternatives to Existing Conditions, which are referred to as the Affected Environment in the Programmatic EIS/EIR.

Since water simulation modeling is needed to identify differences ~~between~~ among alternatives, many of the operational and regulatory features were identified ~~specifically~~ only to serve as assumptions for this modeling effort. For example, while the No Action Alternative includes the NMFS and USFWS biological opinions that address CVP and SWP operations in the Delta, only the numeric operating criteria identified in those biological opinions were incorporated into the simulation modeling for No Action. Changes in project operations in the No Action Alternative may require reinitiation of the consultations. Rather than try to predict and model the kind of operational changes that may still be consistent with the existing biological opinions, CALFED has addressed this by comparing the program alternatives to both the No Action Alternative and to the Existing Conditions. Existing Conditions includes known project operations that are consistent with the biological opinions as of June 1995. Taken together, Existing Conditions and the No Action Alternative cover the range of requirements that may result in reinitiation of the consultations, from the most protective (Existing Conditions) to the most flexible (from a water supply viewpoint). By comparing the project alternatives to both, the PEIS discloses the range of impacts that may result, without having to make an assumption about the specific changes in operations that would require reinitiation of the consultations. A detailed discussion of the modeling assumptions for both the No Action Alternative and Existing Conditions is presented in the No Action Alternative Technical Appendix.

CALFED undertook an intensive public process to describe the No Action Alternative and Existing Conditions. ~~The~~ This process is also fully described in the No Action Alternative Technical Appendix. Table 2.2.1-1 displays the results of CALFED's efforts to describe the No Action Alternative.

(delete the last paragraph in this subsection)

Arts rewrite of IP 2

Since Water simulation modeling is needed to identify differences ~~between~~ among alternatives, many of the operational and regulatory features were identified ~~specifically~~ only to serve as assumptions for this modeling effort. For example, ~~while~~ *modeling of* the No Action Alternative includes the *CVP and SWP Delta operational criteria contained in the* NMFS and USFWS biological opinions, *but does not consider possible changes in the criteria that could result if consultations were reinitiated* ~~that address CVP and SWP operations in the Delta, only the numeric operating criteria identified in those biological opinions were incorporated into the simulation modeling for No Action. Changes in project operations in the No Action Alternative may require reinitiation of the consultations.~~ Rather than try to predict and model the kind of operational changes that *could occur as a result of reinitiation of consultations* ~~may still be consistent with the existing biological opinions,~~ CALFED has addressed this by comparing the program alternatives to both the No Action Alternative and to the Existing Conditions. Existing Conditions includes known project operations that are consistent with the biological opinions as of June 1995. Taken together, Existing Conditions and the No Action Alternative cover the range of requirements that may result in reinitiation of the consultations, from the most protective (Existing Conditions) to the most flexible (from a water supply viewpoint). By comparing the project alternatives to both, the PEIS discloses the range of impacts that may result, without having to make an assumption about the specific changes in operations that would require reinitiation of the consultations. A detailed discussion of the modeling assumptions for both the No Action Alternative and Existing Conditions is presented in the No Action Alternative Technical Appendix.